

Paul W. Chandler, Esq.
CHANDLER LAW FIRM, APC
5150 E. Pacific Coast Highway, Suite 200
Long Beach, California 90804
Telephone: 562.208.8595
Email: chandlerlaw@gmail.com
Admitted Pro Hac Vice
Attorneys for Plaintiff JOHN MCGRAW

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF LAS VEGAS, NEVADA**

JOHN MCGRAW,
Plaintiff,

vs.

CHARLES KIM, individually;
LINDEN HOSPITALITY, LLC; FIRST
AMERICAN
TITLE INSURANCE COMPANY;
LHP RIVERHOUSE HOLDING, LLC;
DOES IX, and ROE CORPORATIONS
I-X, inclusive,
Defendants

CASE NO. 2:22-cv-01414-APG-NJK

**STIPULATION AND ORDER EXTENDING
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT FIRST
AMERICAN TITLE INSURANCE
COMPANY'S MOTION FOR AWARD OF
ATTORNEY'S FEES AND COSTS OF
LITIGATION AGAINST PLAINTIFF JOHN
MCGRAW**

Plaintiff JOHN MCGRAW, Defendants CHARLES KIM, individually; LINDEN
HOSPITALITY, LLC and FIRST AMERICAN TITLE INSURANCE COMPANY, by and through
their undersigned counsel, hereby agree to extend the time for Plaintiff to file response to Defendant
First American Title Insurance Company's motion for award of attorney's fees and costs of litigation
against Plaintiff John McGraw up to and including February 21, 2025, as set out herein below.

Date: February 14, 2025

/s/ Paul W. Chandler

Paul W. Chandler, Esq.
CHANDLER LAW FIRM, APC
5150 E. Pacific Coast Highway, Suite 200
Long Beach, California 90804
Telephone: 562.208.8595
Email: chandlerlaw@gmail.com
Attorneys for Plaintiff JOHN MCGRAW

I.**INTRODUCTION AND STATEMENT OF FACTS**

Defendant First American Title filed its Motion for Summary Judgment which was Granted on January 21, 2025. [ECF No. 96]. On February 4, 2025, First American Title filed a motion seeking an award of attorney's fees and costs of litigation. [ECF No. 111]. The parties are presently attempting to resolve these matters informally and have stipulated and agreed to extend the time for Plaintiff to file his response/opposition to the motion of First American Title until and including February 21, 2025.

This extension request is made in good faith, jointly by the parties, and not for the purposes of delay. Moreover, since this request is a joint request, no party will be prejudiced by granting the extension. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension. Nothing contained herein shall be deemed an admission or waiver of any right belonging to any party hereto.

WHEREFORE, the parties respectfully request that this Court extend the aforementioned period as requested.

IT IS SO STIPULATED:

DATED this 14th day of February 2025

/S/ Tyler N. Ure

Tyler N. Ure, Esq.
Nevada Bar No. 11730
MURCHISON & CUMMING, LLP
350 South Rampart Boulevard, Suite 320
Las Vegas, Nevada 89145
Telephone: (702) 360-3956
Facsimile: (702) 360-3957
E-mail: mnunez@murchisonlaw.com
ture@murchisonlaw.com
Attorneys for Defendants, CHARLES KIM
and LINDEN HOSPITALITY

1 DATED this 14th day of February 2025.

2
3 /s/ John M. Langevele

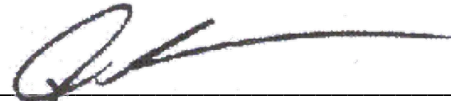
4 John M. Langeveld, Esq.
5 Gerrard Cox Larsen
6 2450 St. Rose Pkwy., Ste. 200 Henderson, NV 89074
7 Telephone: (702) 796-4000
8 Attorneys for First American Title Insurance Company

9 DATED this 14th day of February 2025.

10 /s/ Paul W. Chandler

11 Paul W. Chandler, Esq.
12 CHANDLER LAW FIRM, APC
13 5150 E. Pacific Coast Highway, Suite 200
14 Long Beach, California 90804
15 Telephone: 562.208.8595
16 Email: chandlerlaw@gmail.com
17 Admitted Pro Hac Vice
18 Attorneys for Plaintiff JOHN MCGRAW

19 **IT IS SO ORDERED:**

20 

21 ANDREW P. GORDON
22 CHIEF UNITED STATES DISTRICT JUDGE

23 DATED: February 18, 2025